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**Exhibit A**  
**(Proposed Order)**

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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)  
(Jointly Administered)

**[PROPOSED] ORDER FURTHER  
EXTENDING DEADLINE FOR THE  
REORGANIZED DEBTORS TO OBJECT  
TO CLAIMS AND GRANTING RELATED  
RELIEF**

1           Upon the Motion, dated April 26, 2022, (the “**Motion**”)<sup>1</sup> of PG&E Corporation and Pacific  
2 Gas and Electric Company, as debtors and reorganized debtors (together, the “**Debtors**” or the  
3 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), in  
4 accordance with Section 7.1 of the Plan, sections 105(a) and 1142 of title 11 of the United States  
5 Code (the “**Bankruptcy Code**”), and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure  
6 (the “**Bankruptcy Rules**”), for entry of an order extending the deadline for the Reorganized Debtors  
7 to object to claims by an additional one hundred eighty (180) days, through and including  
8 December 19, 2022, without prejudice to the Reorganized Debtors’ right to seek additional  
9 extensions thereof; and consideration of the Motion and the requested relief being a core proceeding  
10 pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C.  
11 §§ 1408 and 1409; and a hearing having been held on the Motion; and the Court having found and  
12 determined that notice of the Motion as provided to the parties listed therein is reasonable and  
13 sufficient, and it appearing that no other or further notice need be provided; and this Court having  
14 reviewed the Motion and the McWilliams Declaration submitted in support thereof; and this Court  
15 having determined that the legal and factual bases set forth in the Motion establish just cause for the  
16 relief granted herein; and it appearing that the relief requested in the Motion is in the best interests  
17 of the Debtors, their estates, creditors, shareholders, and all parties in interest; and upon all of the  
18 proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

19           **IT IS HEREBY ORDERED THAT:**

- 20           1.     The Motion is granted as provided herein.
- 21           2.     The deadline for the Reorganized Debtors to object to Claims under Section 7.1 of the  
22 Plan (as approved by Paragraph 31 of the Confirmation Order) is further extended by one hundred  
23 eighty (180) days, through and including December 19, 2022, without prejudice to the right of the  
24 Reorganized Debtors to seek additional extensions thereof.

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25           <sup>1</sup> Capitalized terms used but not herein defined have the meanings ascribed to such terms in the  
26 Motion, the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated*  
27 *June 19, 2020* [Dkt. No. 8048] (as it may be amended, modified, or supplemented and together  
28 which any exhibits or schedules thereto, the “**Plan**”), or the *Order Confirming Debtors’ and*  
*Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [Docket  
No. 8053] (the “**Confirmation Order**”), as applicable.

1           3.     Consistent with the Plan and the Confirmation Order, the Debtors and Reorganized  
2 Debtors shall have no obligation to object to Fire Victim Claims or Subrogation Wildfire Claims,  
3 nor shall any such non-objection constitute an allowance or deemed allowance of any Fire Victim  
4 Claim or Subrogation Wildfire Claim. Pursuant to the Plan and the Confirmation Order, all Fire  
5 Victim Claims and Subrogation Wildfire Claims have been channeled to the Fire Victim Trust or  
6 the Subrogation Wildfire Trust, as applicable, and shall be resolved by the applicable Fire Victim  
7 Trust or Subrogation Wildfire Trust, in each case, without any recourse to or Claims whatsoever  
8 against the Debtors or Reorganized Debtors or their assets and properties.

9           4.     For the avoidance of doubt, the relief granted herein does not apply to the existing  
10 deadline for the Reorganized Debtors to object to the United States Claims.

11           5.     This Court shall retain jurisdiction to hear and determine all matters arising from or  
12 related to the implementation, interpretation, or enforcement of this Order.

13                       \*\* END OF ORDER \*\*